

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

Re: ECF Nos. 4476, 4549, 4589

(Jointly Administered)

**MOTION TO WITHDRAW URGENT MOTION
FOR EXTENSION OF TIME WITHOUT PREJUDICE**

TO THE HONORABLE COURT:

COMES NOW Plaza Las Américas, Inc. (hereinafter “Plaza”) as landlord under a certain nonresidential real property lease with the Puerto Rico Department of State (“State Department”) for the operation of a passport office at Plaza’s mall property located at 525 Ave. Franklin Delano Roosevelt in San Juan, Puerto Rico. On December 31, 2018, Plaza filed an urgent motion [ECF No. 4589] seeking to extend the time, until January 31, 2019, granted under a letter sent by the Government of Puerto Rico, Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”), to determine whether to consent to extend the deadline for the assumption or rejection of the lease between Plaza and the Department of State. In the alternative, Plaza requested that

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

the Court confirm the terms of its Bridge Order of December 21, 2018 [ECF No. 4549].

Upon conversations with Attorney Luis Marini, on behalf of AAFAF, Plaza has agreed to withdraw its urgent motion, without prejudice, while Plaza and the State Department attempt to negotiate a new lease.

WHEREFORE, Plaza respectfully requests the withdrawal of its Urgent Motion [ECF No. 4589], without prejudice.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 11th day of January, 2019.

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Notice

Plaza has provided notice of this motion through filing it in CM/ECF, which will provide notice to the Office of the United States Trustee, AAFAF, the FOMB and all parties filing a notice of appearance in these Title III cases. The motion is also being forwarded to Atty. Marianne Cortina, Plaza's designated contact at the State Department, but E-mail to mcortina@estado.pr.gov. Through the filing, the motion will also be available through Prime Clerk.